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COMMISSION MAIL ROOM

Kay Granger, Honorary Chairman 1155 21st Street, N.W., Suite 300 Washington, D.C. 20036

1999 DEC -2 P 2: 35

November 29, 1999

Federal Election Commission Reports Analysis Division

Attn: Lugy J. Denny

999 E Street, NW

Washington, DC 20463

Identification Number: C00345058

RE: Mid-Year Report (01/01/99-06/30/99)

Dear Ms Denny:

This letter is in response to the FEC notice dated November 24, 1999 which questions disclosure of payments for administrative costs for Common Sense Common Solutions Political Action Committee (CSCS).

CSCS pays no salaries, only consulting fees, legal fees, and expenditures for consultants traveling on behalf of the committee. In addition, CSCS rents no office space, its business is conducted out of several offices, with costs covered by said consulting and legal fees.

We apologize for any inconvenience this may have caused and urge you to call if you have any questions.

Sincerely,

Assistant Treasurer



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Barbara W. Bonfiglio, Treasurer Common Sense Common Solutions Political Action Committee 1155 21st Street, NW, Suite 300 Washington, DC 20036

NOV 24 1999

Identification Number: ---- ©00345058-

Reference:

Mid-Year Report (1/1/99-6/30/99)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses no payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed <u>during</u> each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

Lucy J. Denny Reports Analyst

Reports Analysis Division

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## Federal Election Commission

## ENVELOPE REPLACEMENT PAGE

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